

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

EDMUND MURPHY III, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

JBS S.A.,

Defendant.

Case No.: 1:17-cv-03084-ILG-RER

Hon. Judge I. Leo Glasser

Hon. Magistrate Judge Ramon E. Reyes, Jr.

**PLAINTIFF'S NOTICE OF UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF SETTLEMENT**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR COUNSEL OF
RECORD:**

PLEASE TAKE NOTICE that Lead Plaintiff GWI Enterprises Ltd. ("Plaintiff"), by and through its counsel, Levi & Korsinsky, LLP, will and hereby do move this Court, under Rule 23 of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) certifying the proposed Class, certifying Plaintiff as class representative, and appointing Levi & Korsinsky, LLP as class counsel for purposes of the Settlement; (iii) approving the form and manner of giving notice of the proposed Settlement to Class Members; and (iv) scheduling a hearing to consider final approval of the Settlement, approval of the Plan of Allocation, Class Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses, and Plaintiff's request for an incentive award.

Plaintiffs' motion is supported by the Stipulation of Settlement dated December 19, 2018 (filed herewith as Docket No. 38), including the exhibits attached thereto, the accompanying brief in support, and the Declarations of Adam M. Apton and Plaintiff's Claims Administrator, A.B.

Data, Ltd. Also attached hereto is the parties' agreed-upon Proposed Approval Order granting Plaintiff's motion.

Dated: December 20, 2018

Respectfully submitted,

LEVI & KORSINSKY, LLP

/s/ Adam M. Apton

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*Attorneys for Lead Plaintiff GWI Enterprises Ltd.
and Lead Counsel for the Proposed Class*